

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
Fort Lauderdale Division

DVASH AVIATION HOLDINGS, LLC,)	
)	
Plaintiff,)	
)	
v.)	Case No. 0:24-cv-60312-AHS
)	
AMP LEASING LIMITED, <i>et al.</i>)	
)	
Defendants.)	

JOINT MOTION FOR EXTENSION OF MEDIATION DEADLINE

Come now Dvash Aviation Holdings, LLC (“Dvash” or the “Plaintiff”) and AMP Leasing Limited (“AMP” or the “Defendant”) (collectively, the “Parties”), by and through respective undersigned counsel, who move pursuant to pursuant to Fed. R. Civ. P. 6(b)(1) (the “Joint Motion”) for a fourteen (14) day extension of time to select a mediator and schedule a time, date, and place for mediation, as required by the Order Setting Trial and Pre-Trial Schedule, Requiring Mediation, and Referring Certain Matters to Magistrate Judge [DE 27] (the “Scheduling Order”). For the reasons set forth below, the Parties jointly request that the Cour grant the Joint Motion.

1. On July 31, 2024, the Court issued the Scheduling Order which established various deadlines in the case.

2. The parties exchanged initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1), but now request an additional period of time beyond the August 30, 2024 deadline for the selection of a mediator and the scheduling of a time, date, and place for mediation.

3. Counsel for the Parties have a good working relationship with each other, but due to various scheduling issues involving other matters, counsel have not been able to complete their discussions regarding the selection of a mediator.

4. It is for this reason that the Parties jointly request a fourteen (14) day extension of this deadline which should be sufficient time to complete the discussions and advise the Court.

5. This request is being made prior to the expiration of the initial deadline and the Parties submit that good cause exists for the granting of this extension of time.

6. No prior request has been made for the relief requested in this Joint Motion.

WHEREFORE, for the reasons set forth above, the Parties respectfully request that the Court grant the Joint Motion and extend the time until September 13, 2024 for the parties to select a mediator and advise the court of the time, date, and place for mediation, together with such other and further relief as to this Court appears just and proper.

Respectfully Submitted,

THE VERSTANDIG LAW FIRM, LLC

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Certificate of Service

I hereby certify that on August 30, 2024 I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which served a copy of the foregoing upon the following:

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